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ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

The Estate of MARILYN BURGARD, Deceased, by
and through KEVIN HORAN its Special
Administrator,

Plaintiff,

vs.

BANK OF AMERICA, N.A., a foreign Corporation;
AETNA LIFE INSURANCE COMPANY, a foreign
Corporation; DOES I through X; and ROE
CORPORATIONS I through X.

Case No. 2:15-cv-00833-RFB-GWF

PLAINTIFF'S MOTION TO
EXTEND TIME TO FILE
SUPPLEMENTAL BRIEF

COMES NOW Plaintiff, The Estate of MARILYN BURGARD, Deceased, by and through
KEVIN HORAN its Special Administrator, hereby file this Motion to Extend Time to File
Supplemental Brief pursuant to LR6-1.

Pursuant to the above-stated Rule, the Plaintiff requests that they be given an additional one
week extension of time to file their supplemental brief per the Court's Minute Order (ECF 81). This
request encompasses, that if granted, Defendants receive the benefit of the extension as the Court
ordered simultaneous briefing.

Plaintiff attempted to obtain an agreement to extend the supplemental brief deadline from
Defendants, but was unsuccessful. However, Defendants' Counsel has informed our office that they

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1 would not be opposing this Motion for additional time. *See Declaration of Jerome R. Bowen, Esq.*

2 Therefore, Plaintiff requests a one week extension of time up to, and including March 21,
3 2017, for the Parties to file the simultaneous supplemental briefing ordered by the court (ECF 81).
4 This is the first extension of time regarding this briefing. Thus, this Motion is necessitated in the
5 interests of justice. Plaintiff brings this motion in good faith without intending to hinder or delay
6 the prompt adjudication of this matter.
7

8 DATED this 13th of March, 2017.

9 **BOWEN LAW OFFICES**

10 /s/ Jerome R. Bowen, Esq.

11 JEROME R. BOWEN, ESQ.

12 Nevada Bar No. 004540

13 SARAH M. BANDA, ESQ.

14 Nevada Bar No. 011909

15 9960 W. Cheyenne Ave., Suite 250

16 Las Vegas, Nevada 89129

17 IT IS SO ORDERED:

18 

19 RICHARD F. BOULWARE, II

20 United States District Judge

21 DATED this 14th day of March, 2017.

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

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The Estate of MARILYN BURGARD,
Deceased, by and through KEVIN HORAN
its Special Administrator,

Plaintiff,

vs.

BANK OF AMERICA, N.A., a foreign
Corporation; AETNA LIFE INSURANCE
COMPANY, a foreign Corporation; DOES I
through X; and ROE CORPORATIONS I
through X.

Defendants.

Case No. 2:15-cv-00833-RFB-GWF

**DECLARATION OF JEROME R. BOWEN, ESQ. IN SUPPORT OF PLAINTIFF'S
MOTION TO EXTEND TIME TO FILE SUPPLEMENTAL BRIEF**

I, JEROME R. BOWEN, ESQ., declare as follows:

1. I am owner/principal at Bowen Law Offices, and am duly licensed to practice law in the State of Nevada. I am over the age of eighteen (18) years. I am the lead attorney at Bowen Law Offices who represent Plaintiff in the above-entitled action. I have personal knowledge of the facts set forth herein and I am competent to testify to the same.

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3. Thus, I had requested my office contact Defendants' counsel to obtain an agreement to extend the supplemental brief deadline for one week, but Defendants' counsel would not be able to secure his clients' agreement in time. However, Defendants' counsel has informed our office that they would not be opposing this Motion for additional time.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

/s/ Jerome R. Bowen
JEROME R. BOWEN, ESQ.

No notarization required pursuant to NRS 53.045